

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of the Petition of

Satellite Industry Association

To Amend Part 15 of the Commission's Rules  
to Extend Protection from Radar Detectors to  
Ka Band Frequencies

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RM No. 10739

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OFFICE OF THE SECRETARY

REPLY COMMENTS OF SATELLITE INDUSTRY ASSOCIATION

Satellite Industry Association ("SIA") files these reply comments to support the institution of a rulemaking proceeding to amend Section 15.109(h) of the Commission's Rules.<sup>1</sup> SIA earlier petitioned the Commission to amend its rules to require radar detectors to comply with the 500  $\mu$ V/meter limit within the FSS Ka band downlink frequencies at 18.3-18.8 GHz and 19.7-20.2 GHz, which are designated for the geostationary orbit ("GSO") fixed satellite service ("FSS") operations.<sup>2</sup>

Since the SIA Petition was placed on public notice,<sup>3</sup> no comments have been submitted on this matter by any party. Given the importance of this proceeding to the satellite industry and the lack of objection in the rulemaking docket, SIA asks the Commission to commence the requested rulemaking proceeding without delay. As SIA emphasized in its Petition, the nature of radar detector interference requires immediate Commission action to

<sup>1</sup> 47 C.F.R. § 15.109(h)

<sup>2</sup> *Petition of Satellite Industry Association to Amend Part 15 of the Commission's Rules to Extend Protection from Radar Detectors to Ka Band Frequencies*, RM No. 10739 (filed May 28, 2003) ("SIA Petition")

<sup>3</sup> Public Notice, *Consumer & Governmental Affairs Bureau Reference Information Center Petition for Rulemaking Filed*, Report No. 2612 (rel. June 26, 2003)

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protect the development of services in nascent frequency bands. Thus, SIA urges the Commission to amend its rules to extend the current radar detector limits to Ka band downlink frequencies in order to help ensure that the new broadband services emerging in the FSS Ka band will not be subject to harmful interference from the operation of nearby radar detectors.

Further, SIA requests that the rulemaking proceeding also address the extension of the 500  $\mu$ V/meter limit to radar detectors in the FSS downlink spectrum of 18.8-19.3 GHz, which is designated for non-geostationary orbit (“NGSO”) FSS operations. Adopting emission limits now for the FSS downlink spectrum of 18.3-20.2 GHz, before commercial FSS Ka band GSO and NGSO services commence, will forestall even the possibility that radar detector interference in these services could reach the magnitude that required urgent Commission relief in the Ku band less than one year ago.<sup>4</sup>

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<sup>4</sup> *Review of Part 15 and other Parts of the Commission's Rules*, ET Docket 01-278, First Report and Order, 17 FCC Red 14063 (2002) (“Ku Band Radar Order”).

For the reasons stated in these Reply Comments and in the SIA Petition, the Satellite Industry Association respectfully requests that the Commission institute a rulemaking proceeding to extend the emission limits in Section 15.109(h) to the downlink frequencies in the Ka band for both GSO and NGSO services

Respectfully submitted,

SATELLITE INDUSTRY ASSOCIATION

A handwritten signature in black ink, appearing to read 'R DalBello', written over a horizontal line.

By \_\_\_\_\_

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